

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

DEBORAH YOUNG, as Personal Representative)
of the Estate of Gwendolyn Young, deceased,)
Plaintiff,)
vs.)
CORRECTIONAL HEALTHCARE)
COMPANIES, INC., and)
Defendant.)
Case No.: 13-CV-315-IDJ-JFJ

PLAINTIFF'S FIRST BENCH BRIEF

COMES NOW Plaintiff, Deborah Young (“Plaintiff”), as the Personal Representative of the Estate of Gwendolyn Young (“Ms. Young”), deceased, and respectfully submits the following:

On February 16, 2023, the Court ordered Plaintiff to file by 12 p.m. on February 17, 2023, a list of four to six (4-6) CHC customs, policies, or practices which Plaintiff alleges led to the violation of Ms. Young's 8th Amendment Rights and her untimely and preventable death. Plaintiff asserts that such customs, policies, or practices are set out in Plaintiff's pleadings, briefs, the proposed Pretrial Order and proposed Jury Instructions. As reflected in those documents:

Plaintiff alleges that CHC maintained a policy or custom of deficient medical care at the Jail.

In particular, Plaintiff asserts that the evidence establishes:

1. a systemic failure of medical policies and procedures;
2. a pattern of failures to provide medical care in response to serious and obvious medical needs of Jail inmates;
3. failing to provide adequate training and supervision regarding emergent medical conditions;

4. continuing to adhere to a constitutionally deficient system of care for inmates with serious medical needs;
5. a pattern of failures to provide inmates with sufficient access to a physician;
6. a pattern of failures to send inmates with obvious and emergent needs to the hospital.

Respectfully submitted,

s/Robert M. Blakemore

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of February 2022, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

s/Robert M. Blakemore